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September 22, 2020

**VIA ELECTRONIC CASE FILING**

Hon. Philip M. Halpern  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

**Re: *Cosmo Pfeil v. Long Island University***  
**Civil Action No. 7: 20-cv-03160**

Dear Judge Halpern:

Please be advised that we represent Defendant Long Island University in the above-captioned action. It has been stipulated by and between the Parties that Defendant's time to answer, or otherwise respond to, Plaintiff's Amended Complaint is extended from September 24, 2020, up to and including, October 15, 2020.

The Court may wish to note that this is a joint request to extend time to respond to Plaintiff's Amended Complaint as the named Plaintiff in this matter has just recently been changed. We also need this additional time so Plaintiff's counsel may respond to our proposal to stipulate to consolidation of this case with two other class action tuition refund lawsuits pending in the Eastern District of New York (*Moore v. Long Island University*, Civil Action No. 2:20-cv-03843 and *Hofmann v. Long Island University*, Civil Action No. 1:20-cv-04027).

If this meets with Your Honor's approval, the Parties respectfully request you please "So Order" where indicated below.

Respectfully Submitted,

BOND, SCHOENECK & KING, PLLC

**SO ORDERED**

  
Samuel G. Dobre

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Hon. Philip M. Halpern

cc: Sarah Westcot, Esq.  
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